

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

\*\*\*\*\*

UNITED STATES OF AMERICA  
v.

Criminal Action No. 3:15-CR-269  
(TJM)

ROBERT SNYDER,

STIPULATION AND ORDER  
FOR ENLARGEMENT OF TIME

Defendant.

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STIPULATION

It is hereby stipulated and agreed, by and between the defendant as represented by counsel's signature below, and Richard S. Hartunian, United States Attorney for the Northern District of New York, by Miroslav Lovric, Assistant United States Attorney, that the time within which trial must commence under the provisions of Title 18, United States Code, Section 3161(c), be enlarged and extended by 45 days from the date of the signing of this Order and that time be excluded, pursuant to Title 18, United States Code, Section 3161(h)(7)(A)&(B), from the computation of the time within which a trial must commence under the provisions of Title 18, United States Code, Section 3161(c), because the ends of justice served by granting this continuance outweigh the best interests of the public, government and the defendant in a speedy trial.

This speedy trial exclusion and continuance is warranted for the following reasons:

- 1) The Defendant was indicted and the indictment was filed on September 23, 2015.
- 2) The government has provided discovery to the defendant. It will take some time for defendant to review and digest these discovery materials. The delay and the enlargement of time is necessary in order to allow the parties the reasonable time necessary for

effective preparation and examination of discovery materials, and the making of certain decisions, taking into account the exercise of due diligence (3161(h)(7)(B)(iv)).


- 3) The enlargement of time will also allow defendant, after reviewing the discovery materials, to make informed decisions regarding possibly entering a guilty plea or to proceeding to trial.

The undersigned government attorney and attorney for defendant join in this speedy trial exclusion application and apply for and consent to the proposed order.

Dated: October 21, 2015

RICHARD S. HARTUNIAN  
United States Attorney

*Miroslav Lovric*  
Assistant U.S. Attorney

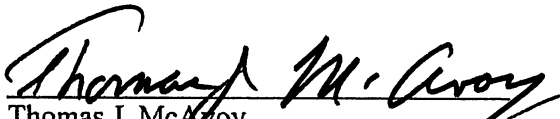
  
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Randi Juda Bianco, Esq.  
Attorney for defendant Snyder 507514

ORDER

Based on the foregoing stipulation, all the facts contained therein, and the Court incorporates into this Order the stipulated facts set forth above and hereby adopts them as findings, it is hereby ORDERED that the time within which trial must commence under the provisions of Title 18, United States Code, Section 3161(c), be enlarged and extended by 45 days from the date of the signing of this Order and that time be excluded, pursuant to Title 18, United States Code, Section 3161(h)(7)(A)&(B), from the computation of the time within which a trial must commence under the provisions of Title 18, United States Code, Section 3161(c), because the ends of justice served by granting this continuance outweigh the best interests of the public, government and the defendant in a speedy trial for the reasons articulated and stipulated above in the stipulation.

SO ORDERED:

Dated: October 23, 2015

  
Thomas J. McAvoy  
Senior Judge, United States District Court  
N.D.N.Y.

- A. Defense Motions shall be filed on: 12/18/15
- B. The government's response papers shall be filed on: per local rules
- C. The motions are returnable on 1/22/16, at the Federal Courthouse in Binghamton, New York at 10:00 A.M.
- D. The trial is scheduled for and shall commence on 1/25/16 at the Federal Courthouse in Binghamton, New York at 10:00 A.M.